

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

**P and R Moulding, Inc.
56769 Elk Park Drive and 56616 Elk Park Drive
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-11834-00299	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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**Six (6) flow coating machines (EU-24, EU-25, EU-29, EU-30, EU-31 and EU-32),
Three (3) ink coating machines (EU-26, EU-27 and EU-28) and
Two (2) adhesive coating machines (EU-33 and EU-33A)**

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood moulding trim finish facility.

Authorized individual:	Ramon Hardy
Source Address:	56769 Elk Park Drive and 56616 Elk Park Drive Elkhart, IN 46516
Mailing Address:	56616 Elk Park Drive, Elkhart, IN 56616
Phone Number:	(219) 522-4811
SIC Code:	2499
Source Location Status:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

Plant 1 (located at 56769 Elk Park Drive) consists of the following emission units and pollution control devices:

- (a) Three (3) ink coating machines, identified as EU-26, EU-27 and EU-28, utilizing a roller coater to print a maximum of 109 units of wood per hour; and
- (b) Four (4) flow coating machines, identified as EU-29, EU-30, EU-31 and EU-32, used to finish a maximum of 75 wood mouldings per hour.

Plant 2 (located at 56616 Elk Park Drive) consists of the following emission units and pollution control devices:

- (c) Two (2) flow coating machines, identified as EU-24 and EU-25, used to coat a maximum of 75 wood mouldings per hour; and
- (d) Two (2) adhesive coating machines, identified as EU-33 and EU-33A, used to wrap a maximum of 115 wood line per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million

(10,000,000) Btu per hour;

- (b) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (c) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (g) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (h) Paved and unpaved roads and parking lots with public access;
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations;
- (k) Other activities or categories not previously identified:
 - (1) one (1) profile sander;
 - (2) one (1) vinyl splitter;
 - (3) one (1) band saw;
 - (4) two (2) drying ovens;

- (5) twelve (12) tube heaters;
- (6) one (1) furnace;
- (7) one (1) air make up system;
- (8) one (1) 10" swing saw;
- (9) one (1) table saw;
- (10) one (1) portable dust collector;
- (11) one (1) no VOC hot melt vinyl wood wrapper machines;
- (12) one (1) solvent vinyl wood wrapper machine (using a maximum of 55 gallons of MEK per year);
- (13) Three (3) barrel top dust collectors; and
- (14) Ten (10) hand touch up sanders.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required

to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; and
- (3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM,

on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a

requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does

require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in

326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the

certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75

cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management

Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this

permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;

- (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Plant 1 (located at 56769 Elk Park Drive) consists of the following emission units and pollution control devices:

- (a) Three (3) ink coating machines, identified as EU-26, EU-27 and EU-28, utilizing a roller coater to print a maximum of 109 units of wood per hour; and
- (b) Four (4) flow coating machines, identified as EU-29, EU-30, EU-31 and EU-32, used to finish a maximum of 75 wood mouldings per hour.

Plant 2 (located at 56616 Elk Park Drive) consists of the following emission units and pollution control devices:

- (c) Two (2) flow coating machines, identified as EU-24 and EU-25, used to coat a maximum of 75 wood mouldings per hour; and
- (d) Two (2) adhesive coating machines, identified as EU-33 and EU-33A, used to wrap a maximum of 115 wood line per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

D.1.2 FESOP Limit [326 IAC 2-8]

Coating material input usage to the six (6) flow coating machines (EU-24, EU-25, EU-29, EU-30, EU-31 and EU-32), the three (3) ink coating machines (EU-26, EU-27 and EU-28) and the two (2) adhesive coating machines (EU-33 and EU-33A) shall be limited as follows:

- (a) The total volatile organic compound (VOC) input usage, including VOC solvent usage, minus VOC solvent shipped out, shall be limited to less than 100 tons per twelve (12) consecutive month period; and
- (b) Single hazardous air pollutant (HAP) input usage is limited to less than ten (10) tons per twelve (12) consecutive month period, and total combined HAP input usage is limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 VOC Emissions

Compliance with Condition D.1.2(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.6 HAP Emissions

Compliance with Condition D.1.2(b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP (individual and combined) usage limits and/or the VOC and HAP (individual and combined) emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount and VOC and HAP (individual and combined) content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC, individual HAP, and combined HAP usage for each month; and
 - (5) The weight of VOCs, individual HAP, and combined HAP emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: P and R Moulding, Inc.
Source Address: 56769 Elk Park Drive and 56616 Elk Park Drive, Elkhart, IN 46516
Mailing Address: 56616 Elk Park Drive, Elkhart, IN 46516
FESOP No.: F039-11834-00299

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: P and R Moulding, Inc.
Source Address: 56769 Elk Park Drive and 56616 Elk Park Drive, Elkhart, IN 46516
Mailing Address: 56616 Elk Park Drive, Elkhart, IN 46516
FESOP No.: F039-11834-00299

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Management (OAM), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
CThe Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: P and R Moulding, Inc.
Source Address: 56769 Elk Park Drive and 56616 Elk Park Drive, Elkhart, IN 46516
Mailing Address: 56616 Elk Park Drive, Elkhart, IN 46516
FESOP No.: F039-11834-00299
Facility: EU-24, EU-25, EU-26, EU-27, EU-28, EU-29, EU-30, EU-31, EU-32, EU-33 and EU-33A
Parameter: VOC, Individual HAP and Total Combined HAPs
Limit: VOC emissions not to exceed 100 tons per twelve (12) consecutive month period rolled on a monthly basis, single HAP emissions not to exceed 10 tons per twelve (12) consecutive month period and total HAP emissions not to exceed 25 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1a	Column 1b	Column 1c	Column 2a	Column 2b	Column 2c	Column 1a + 2a	Column 1b + 2b	Column 1c + 2c
	VOC Usage This Month	Single HAP Usage This Month	Total HAP Usage This Month	VOC Usage Previous 11 months	Single HAP Usage Previous 11 months	Total HAP Usage Previous 11 Months	VOC Usage 12 Month Total	Single HAP Usage 12 Month Total	Total HAP Usage 12 Month Total
Month 1									
Month 2									
Month 3									

- 9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: P and R Moulding, Inc.
Source Address: 56769 Elk Park Drive and 56616 Elk Park Drive, Elkhart, IN 46516
Mailing Address: 56616 Elk Park Drive, Elkhart, IN 46516
FESOP No.: F039-11834-00299

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: P and R Moulding, Inc.
Source Location: 56769 Elk Park Drive and 56616 Elk Park Drive, Elkhart, IN 46516
County: Elkhart
SIC Code: 2499
Operation Permit No.: F039-11834-00299
Permit Reviewer: Nishat Hydari / EVP

The Office of Air Management (OAM) has reviewed a FESOP application from P and R Moulding, Inc. relating to the operation of a stationary wood moulding trim finish facility.

Source Definition

This stationary wood moulding trim finish company consists of two (2) plants:

- (a) Plant 1 is located at 56769 Elk Park Drive, Plant ID 039-00193
- (b) Plant 2 is located at 56616 Elk Park Drive, Plant ID 039-00299

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. For OAM tracking purposes the combined source will be using 039-00299 as the plant ID.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Plant 1 consists of the following emission units and pollution control devices:

- (a) Three (3) ink coating machines, identified as EU-26, EU-27 and EU-28, utilizing a roller coater to print a maximum of 109 units of wood per hour; and
- (b) Four (4) flow coating machines, identified as EU-29, EU-30, EU-31 and EU-32, used to finish a maximum of 75 wood mouldings per hour.

Plant 2 consists of the following emission units and pollution control devices:

- (c) Two (2) flow coating machines, identified as EU-24 and EU-25, used to coat a maximum of 75 wood mouldings per hour; and

- (d) Two (2) adhesive coating machines, identified as EU-33 and EU-33A, used to wrap a maximum of 115 wood line per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units during this review process.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (b) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (c) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (g) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (h) Paved and unpaved roads and parking lots with public access;
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations;
- (k) Other activities or categories not previously identified:

- (1) one (1) profile sander;
- (2) one (1) vinyl splitter;
- (3) one (1) band saw;
- (4) two (2) drying ovens;
- (5) twelve (12) tube heaters;
- (6) one (1) furnace;
- (7) one (1) air make up system;
- (8) one (1) 10" swing saw;
- (9) one (1) table saw;
- (10) one (1) portable dust collector;
- (11) one (1) no VOC hot melt vinyl wood wrapper machines;
- (12) one (1) solvent vinyl wood wrapper machine (using a maximum of 55 gallons of MEK per year);
- (13) Three (3) barrel top dust collectors; and
- (14) Ten (10) hand touch up sanders.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

Plant 1 (located at 56769 Elk Park Drive, Elkhart, IN 46516)

- (a) Registration 039-3131-00193, issued on December 29, 1993; and
- (b) Exemption 039-3422-00193, issued on January 3, 1994.

Plant 2 (located at 56616 Elk Park Drive, Elkhart, IN 46516)

- (a) Registration 039-4280-00299, issued on January 18, 1995;
- (b) Exemption 039-8242-00299, issued on January 2, 1998; and
- (c) SSOA 039-8243-00299, issued on October 20, 1999.

All conditions from previous approvals were incorporated into this FESOP, except the following:

- (a) SSOA 039-8243-00299, issued on October 20, 1999. This permit and all the conditions contained therein, will be replaced by FESOP F039-11834-00299 upon its approval.

For OAM tracking purposes, the two (2) plants will have 039-00299 as the plant ID.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on February 1, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 4).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.02
PM-10	0.08
SO ₂	0.01
VOC	333.01
CO	0.92
NO _x	1.10

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Toluene	19.57
Xylene	0.09
Methanol	6.49
MEK	12.99
MIK	6.49
Glycol Ethers	40.67
Triethylamine	1.41
TOTAL	87.71

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	HAPs
EU-24, EU-25, EU-26, EU-27, EU-28, EU-29, EU-30, EU-31, EU-32, EU-33 and EU-33A	0.00	0.00	0.00	98.99	0.00	0.00	9.90	21.35
Insignificant Activities	0.02	0.08	0.01	0.06	0.92	1.10	0.00	0.00
Total Emissions	0.02	0.08	0.01	99.05	0.92	1.10	9.90	21.35

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment or unclassifiable for ozone.

- (b) Elkhart County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this source.
- (c) The National Emission Standards for Wood Furniture Manufacturing Operations 40 CFR 63, Subpart JJ, does not apply to the source, because this source has taken a limit to control single HAP emissions to less than 10 tons per year and total HAP emissions to less than 25 tons per year. The record keeping and reporting requirements still apply to show that single HAP emissions are less than 10 tons per year and total HAP emissions are less than 25 tons per year.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

The six (6) flow coating machines (EU-24, EU-25, EU-29, EU-30, EU-31 and EU-32), the three (3) ink coating machines (EU-26, EU-27 and EU-28) and the two (2) adhesive coating machines (EU-33 and EU-33A) are not subject to 326 IAC 2-4.1-1 (New Source Toxic Control) because the source has taken a limit to control single HAP emissions to less than 10 tons per year and total HAP emissions to less than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

Coating material input usage to the six (6) flow coating machines (EU-24, EU-25, EU-29, EU-30, EU-31 and EU-32), the three (3) ink coating machines (EU-26, EU-27 and EU-28) and the two (2) adhesive coating machines (EU-33 and EU-33A) shall be limited as follows:

- (a) The total volatile organic compound (VOC) input usage, including VOC solvent usage, minus VOC solvent shipped out, shall be limited to less than 100 tons per twelve (12) consecutive month period; and
- (b) Single hazardous air pollutant (HAP) input usage is limited to less than ten (10) tons per twelve (12) consecutive month period, and total combined HAP input usage is limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) 326 IAC 6-3-2 does not apply to EU-24, EU-25, EU-29, EU-30, EU-31 and EU-32 because they are flow coating processes with an estimated transfer efficiency of 100% which results in no PM overspray emissions.
- (b) 326 IAC 6-3-2 does not apply to EU-26, EU-27 and EU-28 because they are ink coating processes that utilize roller printers with an estimated transfer efficiency of 100% which results in no PM overspray emissions.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This rule still applies even though the source is taking a FESOP. Pursuant to CP 039-3131-00193, issued on December 29, 1993, the surface coating applied to the wood and the wood moulding shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

EU-26, EU-27 and EU-28 use roller coating and EU-29, EU-30, EU-31 and EU-32 use flowcoating, therefore, the source is in compliance with this rule.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this source.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations (Appendix A, page 3).

Conclusion

The operation of this stationary wood moulding trim finish facility shall be subject to the conditions of the attached proposed **FESOP No.: F039-11834-00299**.

Appendix A: Emission Calculations

Company Name: P and R Moulding, Inc.
Address City IN Zip: 56769 Elk Park Drive and 56616 Elk Park Drive, Elkhart, IN 46516
FESOP: 039-11834
Plt ID: 039-00299
Reviewer: Nishat Hydari / EVP

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating	Insignificant Activities	TOTAL
PM	0.00	0.02	0.02
PM10	0.00	0.08	0.08
SO2	0.00	0.01	0.01
NOx	0.00	1.10	1.10
VOC	332.95	0.06	333.01
CO	0.00	0.92	0.92
total HAPs	87.71	0.00	87.71
worst case single HAP	40.67	0.00	40.67
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating	Insignificant Activities	TOTAL
PM	0.00	0.02	0.02
PM10	0.00	0.08	0.08
SO2	0.00	0.01	0.01
NOx	0.00	1.10	1.10
VOC	98.99	0.06	99.05
CO	0.00	0.92	0.92
total HAPs	21.35	0.00	21.35
worst case single HAP	9.90	0.00	9.90
Total emissions based on rated capacity at 8,760 hours/year, after control.			

VOC and Particulate
From Surface Coating Operations

Company Name: P & R Moulding, Inc.
Address City IN Zip: 56769 Elk Park Drive and 56616 Elk Park Drive, Elkhart, IN 46516
FESOP: 039-11834
PI ID: 039-00299
Reviewer: Nishat Hydari / EVP

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU-24																
Elite Grey	9.05	55.00%	0.00%	55.00%	0.00%	26.00%	0.00728	75.000	4.98	4.98	2.72	65.23	11.90	0.00	19.14	100%
Heart # 3	9.81	25.10%	0.00%	25.10%	0.00%	31.00%	0.00728	75.000	2.46	2.46	1.34	32.27	5.89	0.00	7.94	100%
MM 52	10.02	68.00%	42.00%	26.00%	45.00%	31.00%	0.00728	75.000	4.74	2.61	1.42	34.14	6.23	0.00	8.40	100%
50-230 Primer	10.99	53.87%	49.03%	4.84%	55.00%	27.43%	0.01050	75.000	1.18	0.53	0.42	10.05	1.83	0.00	1.94	100%
Sherwood Lacquer	8.53	70.00%	40.00%	30.00%	45.00%	29.00%	0.02480	75.000	4.65	2.56	4.76	114.23	20.85	0.00	8.82	100%
Orange Spice	8.66	91.058%	81.09%	9.97%	87.38%	6.31%	0.00728	75.000	6.84	0.86	0.47	11.31	2.06	0.00	13.68	100%
1482	8.946	67.375%	57.42%	9.95%	59.00%	31.00%	0.00728	75.000	2.17	0.89	0.49	11.67	2.13	0.00	2.87	100%
EU-25																
Elite Grey	9.05	55.00%	0.00%	55.00%	0.00%	26.00%	0.00728	75.000	4.98	4.98	2.72	65.23	11.90	0.00	19.14	100%
Heart # 3	9.81	25.10%	0.00%	25.10%	0.00%	31.00%	0.00728	75.000	2.46	2.46	1.34	32.27	5.89	0.00	7.94	100%
MM 52	10.02	68.00%	42.00%	26.00%	45.00%	31.00%	0.00728	75.000	4.74	2.61	1.42	34.14	6.23	0.00	8.40	100%
50-230 Primer	10.99	53.87%	49.03%	4.84%	55.00%	27.43%	0.01050	75.000	1.18	0.53	0.42	10.05	1.83	0.00	1.94	100%
Sherwood Lacquer	8.53	70.00%	40.00%	30.00%	45.00%	29.00%	0.02480	75.000	4.65	2.56	4.76	114.23	20.85	0.00	8.82	100%
Orange Spice	8.66	91.058%	81.09%	9.97%	87.38%	6.31%	0.00728	75.000	6.84	0.86	0.47	11.31	2.06	0.00	13.68	100%
1482	8.946	67.375%	57.42%	9.95%	59.00%	31.00%	0.00728	75.000	2.17	0.89	0.49	11.67	2.13	0.00	2.87	100%
EU-29																
Elite Grey	9.05	55.00%	0.00%	55.00%	0.00%	26.00%	0.00728	75.000	4.98	4.98	2.72	65.23	11.90	0.00	19.14	100%
Heart # 3	9.81	25.10%	0.00%	25.10%	0.00%	31.00%	0.00728	75.000	2.46	2.46	1.34	32.27	5.89	0.00	7.94	100%
MM 52	10.02	68.00%	42.00%	26.00%	45.00%	31.00%	0.00728	75.000	4.74	2.61	1.42	34.14	6.23	0.00	8.40	100%
50-230 Primer	10.99	53.87%	49.03%	4.84%	55.00%	27.43%	0.01050	75.000	1.18	0.53	0.42	10.05	1.83	0.00	1.94	100%
Sherwood Lacquer	8.53	70.00%	40.00%	30.00%	45.00%	29.00%	0.02480	75.000	4.65	2.56	4.76	114.23	20.85	0.00	8.82	100%
Orange Spice	8.66	91.058%	81.09%	9.97%	87.38%	6.31%	0.00728	75.000	6.84	0.86	0.47	11.31	2.06	0.00	13.68	100%
1482	8.946	67.375%	57.42%	9.95%	59.00%	31.00%	0.00728	75.000	2.17	0.89	0.49	11.67	2.13	0.00	2.87	100%
EU-30																
Elite Grey	9.05	55.00%	0.00%	55.00%	0.00%	26.00%	0.00728	75.000	4.98	4.98	2.72	65.23	11.90	0.00	19.14	100%
Heart # 3	9.81	25.10%	0.00%	25.10%	0.00%	31.00%	0.00728	75.000	2.46	2.46	1.34	32.27	5.89	0.00	7.94	100%
MM 52	10.02	68.00%	42.00%	26.00%	45.00%	31.00%	0.00728	75.000	4.74	2.61	1.42	34.14	6.23	0.00	8.40	100%
50-230 Primer	10.99	53.87%	49.03%	4.84%	55.00%	27.43%	0.01050	75.000	1.18	0.53	0.42	10.05	1.83	0.00	1.94	100%
Sherwood Lacquer	8.53	70.00%	40.00%	30.00%	45.00%	29.00%	0.02480	75.000	4.65	2.56	4.76	114.23	20.85	0.00	8.82	100%
Orange Spice	8.66	91.058%	81.09%	9.97%	87.38%	6.31%	0.00728	75.000	6.84	0.86	0.47	11.31	2.06	0.00	13.68	100%
1482	8.946	67.375%	57.42%	9.95%	59.00%	31.00%	0.00728	75.000	2.17	0.89	0.49	11.67	2.13	0.00	2.87	100%
EU-31																
Elite Grey	9.05	55.00%	0.00%	55.00%	0.00%	26.00%	0.00728	75.000	4.98	4.98	2.72	65.23	11.90	0.00	19.14	100%
Heart # 3	9.81	25.10%	0.00%	25.10%	0.00%	31.00%	0.00728	75.000	2.46	2.46	1.34	32.27	5.89	0.00	7.94	100%
MM 52	10.02	68.00%	42.00%	26.00%	45.00%	31.00%	0.00728	75.000	4.74	2.61	1.42	34.14	6.23	0.00	8.40	100%
50-230 Primer	10.99	53.87%	49.03%	4.84%	55.00%	27.43%	0.01050	75.000	1.18	0.53	0.42	10.05	1.83	0.00	1.94	100%
Sherwood Lacquer	8.53	70.00%	40.00%	30.00%	45.00%	29.00%	0.02480	75.000	4.65	2.56	4.76	114.23	20.85	0.00	8.82	100%
Orange Spice	8.66	91.058%	81.09%	9.97%	87.38%	6.31%	0.00728	75.000	6.84	0.86	0.47	11.31	2.06	0.00	13.68	100%
1482	8.946	67.375%	57.42%	9.95%	59.00%	31.00%	0.00728	75.000	2.17	0.89	0.49	11.67	2.13	0.00	2.87	100%
EU-32																
Elite Grey	9.05	55.00%	0.00%	55.00%	0.00%	26.00%	0.00728	75.000	4.98	4.98	2.72	65.23	11.90	0.00	19.14	100%
Heart # 3	9.81	25.10%	0.00%	25.10%	0.00%	31.00%	0.00728	75.000	2.46	2.46	1.34	32.27	5.89	0.00	7.94	100%
MM 52	10.02	68.00%	42.00%	26.00%	45.00%	31.00%	0.00728	75.000	4.74	2.61	1.42	34.14	6.23	0.00	8.40	100%
50-230 Primer	10.99	53.87%	49.03%	4.84%	55.00%	27.43%	0.01050	75.000	1.18	0.53	0.42	10.05	1.83	0.00	1.94	100%
Sherwood Lacquer	8.53	70.00%	40.00%	30.00%	45.00%	29.00%	0.02480	75.000	4.65	2.56	4.76	114.23	20.85	0.00	8.82	100%
Orange Spice	8.66	91.058%	81.09%	9.97%	87.38%	6.31%	0.00728	75.000	6.84	0.86	0.47	11.31	2.06	0.00	13.68	100%
1482	8.946	67.375%	57.42%	9.95%	59.00%	31.00%	0.00728	75.000	2.17	0.89	0.49	11.67	2.13	0.00	2.87	100%
Clean Up																
MEK	6.74	100.00%	0.00%	100.00%	0.00%	0.00%	0.00000	0.000	6.74	6.74	0.00	0.00	0.00	0.00	ERR	100%
EU-33																
47910 W.B. Adhesive	9.16	100.00%	60.00%	40.00%	65.00%	34.00%	0.00250	115.000	10.47	3.66	1.05	25.28	4.61	0.00	10.78	0%
EU-33A																
47910 W.B. Adhesive	9.16	100.00%	60.00%	40.00%	65.00%	34.00%	0.00250	115.000	10.47	3.66	1.05	25.28	4.61	0.00	10.78	0%
EU-26																
Acetate	7.7	100.00%	0.00%	100.00%	0.00%	0.00%	0.00150	109.000	7.70	7.70	1.26	30.21	5.51	0.00	ERR	100%
150 Ink	7.7	98.00%	0.00%	98.00%	0.00%	1.00%	0.000165	109.000	7.55	7.55	0.14	3.26	0.59	0.00	754.60	100%
EU-27																
Acetate	7.7	100.00%	0.00%	100.00%	0.00%	0.00%	0.00150	109.000	7.70	7.70	1.26	30.21	5.51	0.00	ERR	100%
150 Ink	7.7	98.00%	0.00%	98.00%	0.00%	1.00%	0.000165	109.000	7.55	7.55	0.14	3.26	0.59	0.00	754.60	100%
EU-28																
Acetate	7.7	100.00%	0.00%	100.00%	0.00%	0.00%	0.00150	109.000	7.70	7.70	1.26	30.21	5.51	0.00	ERR	100%
150 Ink	7.7	98.00%	0.00%	98.00%	0.00%	1.00%	0.000165	109.000	7.55	7.55	0.14	3.26	0.59	0.00	754.60	100%

State Potential Emissions

Add worst case coating to all solvents

76.02

1824.37

332.95

0.00

Controlled Potential Emissions							
	Material Usage Limitation	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
		VOC	PM				
	Total Controlled Potential Emissions:	29.73%	0.00%	0.00%	22.60	542.39	98.99

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hrs/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations

HAP Emission Calculations

Page 3 of 4 TSD Appa

Company Name: P & R Moulding, Inc.
Address City IN Zip: 56769 Elk Park Drive and 56616 Elk Park Drive, Elkhart, IN 46516
FESOP#: 039-11834
Pit ID: 039-00299
Permit Reviewer: Nishat Hydari / EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Methanol	Weight % MEK	Weight % MIK	Weight % Glycol Ethers	Weight % Triethylamine	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Methanol Emissions (ton/yr)	MEK Emissions (ton/yr)	MIK Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Triethylamine Emissions (ton/yr)
EU24																	
Elite Grey	9.05	0.00728	75.000	15.00%	0.00%	5.00%	10.00%	5.00%	0.00%	0.00%	3.25	0.00	1.08	2.16	1.08	0.00	0.00
Heart # 3	9.81	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	1.00%	0.00	0.00	0.00	0.00	0.00	1.17	0.23
MM 52	10.02	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.96	0.00
50-230 Primer	10.99	0.01050	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.84%	0.00%	0.00	0.00	0.00	0.00	0.00	1.83	0.00
Sherwood Lacquer	8.53	0.02480	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.69	0.00
Orange Spice	8.66	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.4082%	0.00%	0.00	0.00	0.00	0.00	0.00	0.08	0.00
1482	8.946	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	9.50%	0.00%	0.00	0.00	0.00	0.00	0.00	2.03	0.00
EU25																	
Elite Grey	9.05	0.00728	75.000	15.00%	0.00%	5.00%	10.00%	5.00%	0.00%	0.00%	3.25	0.00	1.08	2.16	1.08	0.00	0.00
Heart # 3	9.81	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	1.00%	0.00	0.00	0.00	0.00	0.00	1.17	0.23
MM 52	10.02	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.96	0.00
50-230 Primer	10.99	0.01050	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.84%	0.00%	0.00	0.00	0.00	0.00	0.00	1.83	0.00
Sherwood Lacquer	8.53	0.02480	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.69	0.00
Orange Spice	8.66	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.4082%	0.00%	0.00	0.00	0.00	0.00	0.00	0.08	0.00
1482	8.946	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	9.50%	0.00%	0.00	0.00	0.00	0.00	0.00	2.03	0.00
EU29																	
Elite Grey	9.05	0.00728	75.000	15.00%	0.00%	5.00%	10.00%	5.00%	0.00%	0.00%	3.25	0.00	1.08	2.16	1.08	0.00	0.00
Heart # 3	9.81	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	1.00%	0.00	0.00	0.00	0.00	0.00	1.17	0.23
MM 52	10.02	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.96	0.00
50-230 Primer	10.99	0.01050	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.84%	0.00%	0.00	0.00	0.00	0.00	0.00	1.83	0.00
Sherwood Lacquer	8.53	0.02480	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.69	0.00
Orange Spice	8.66	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.4082%	0.00%	0.00	0.00	0.00	0.00	0.00	0.08	0.00
1482	8.946	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	9.50%	0.00%	0.00	0.00	0.00	0.00	0.00	2.03	0.00
EU30																	
Elite Grey	9.05	0.00728	75.000	15.00%	0.00%	5.00%	10.00%	5.00%	0.00%	0.00%	3.25	0.00	1.08	2.16	1.08	0.00	0.00
Heart # 3	9.81	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	1.00%	0.00	0.00	0.00	0.00	0.00	1.17	0.23
MM 52	10.02	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.96	0.00
50-230 Primer	10.99	0.01050	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.84%	0.00%	0.00	0.00	0.00	0.00	0.00	1.83	0.00
Sherwood Lacquer	8.53	0.02480	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.69	0.00
Orange Spice	8.66	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.4082%	0.00%	0.00	0.00	0.00	0.00	0.00	0.08	0.00
1482	8.946	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	9.50%	0.00%	0.00	0.00	0.00	0.00	0.00	2.03	0.00
EU31																	
Elite Grey	9.05	0.00728	75.000	15.00%	0.00%	5.00%	10.00%	5.00%	0.00%	0.00%	3.25	0.00	1.08	2.16	1.08	0.00	0.00
Heart # 3	9.81	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	1.00%	0.00	0.00	0.00	0.00	0.00	1.17	0.23
MM 52	10.02	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.96	0.00
50-230 Primer	10.99	0.01050	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.84%	0.00%	0.00	0.00	0.00	0.00	0.00	1.83	0.00
Sherwood Lacquer	8.53	0.02480	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.69	0.00
Orange Spice	8.66	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.4082%	0.00%	0.00	0.00	0.00	0.00	0.00	0.08	0.00
1482	8.946	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	9.50%	0.00%	0.00	0.00	0.00	0.00	0.00	2.03	0.00
EU32																	
Elite Grey	9.05	0.00728	75.000	15.00%	0.00%	5.00%	10.00%	5.00%	0.00%	0.00%	3.25	0.00	1.08	2.16	1.08	0.00	0.00
Heart # 3	9.81	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	1.00%	0.00	0.00	0.00	0.00	0.00	1.17	0.23
MM 52	10.02	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.96	0.00
50-230 Primer	10.99	0.01050	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.84%	0.00%	0.00	0.00	0.00	0.00	0.00	1.83	0.00
Sherwood Lacquer	8.53	0.02480	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.69	0.00
Orange Spice	8.66	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.4082%	0.00%	0.00	0.00	0.00	0.00	0.00	0.08	0.00
1482	8.946	0.00728	75.000	0.00%	0.00%	0.00%	0.00%	0.00%	9.50%	0.00%	0.00	0.00	0.00	0.00	0.00	2.03	0.00
Clean Up																	
MEK	6.74	0.00000	0.000	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU26																	
150 Ink	7.7	0.000165	109.000	5.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03	0.03	0.00	0.00	0.00	0.00	0.00
EU27																	
150 Ink	7.7	0.000165	109.000	5.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03	0.03	0.00	0.00	0.00	0.00	0.00
EU28																	
150 Ink	7.7	0.000165	109.000	5.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03	0.03	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 19.57 0.09 6.49 12.99 6.49 40.67 1.41

Total Uncontrolled HAPs (tons/yr) 87.71

Controlled Potential Emissions								
Material Usage Limitation	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Methanol Emissions (ton/yr)	MEK Emissions (ton/yr)	MIK Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Triethylamine Emissions (ton/yr)	
Total Controlled Potential Emissions:	24.34%	4.76	0.02	1.58	3.16	1.58	9.90	0.34

METHODOLOGY

Total Controlled HAPs (tons/yr) 21.35

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: P & R Moulding, Inc.
Address City IN Zip: 56769 Elk Park Drive and 56616 Elk Park Drive, Elkhart, IN 46516
FESOP: 039-11834
Pit ID: 039-00299
Reviewer: Nishat Hydari / EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.5

21.9

Facilities	MMBtu/hr
Dry oven	1.5
Air Make Up Unit	1
Total	2.5

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.02	0.08	0.01	1.10	0.06	0.92

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).